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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

GRISelda CANCELADA LICEAGA,
VERONICA MORA, and
YOSELIN PEREZ RAMIREZ,

Defendants.

) No. 4:22-mj-71156-MAG
) **STIPULATION TO CONTINUE STATUS ON**
) **PRELIMINARY HEARING OR**
) **ARRAIGNMENT AND BAIL REVIEW/BOND**
) **HEARING FROM SEPTEMBER 22, 2022**
) **THROUGH SEPTEMBER 30, 2022 AND TO**
) **EXCLUDE TIME UNDER THE SPEEDY**
) **TRIAL ACT AND RULE 5.1 AND ORDER (AS**
) **MODIFIED)**

The Court has set a status on preliminary hearing or arraignment for September 22, 2022. Due to scheduling considerations and the defendants' preference to appear for court in Oakland where they reside, the parties now respectfully request to reschedule the date for preliminary hearing or arraignment to September 30, 2022 and to exclude time under the Speedy Trial Act and Rule 5.1 through September 30, 2022. The government is producing some initial discovery to defendants now and will provide additional discovery to defendants soon.

Therefore, the parties hereby stipulate and agree:

1. The status on preliminary hearing or arraignment scheduled for September 22, 2022, should be reset to September 30, 2022.

2. The time between September 22, 2022 and September 30, 2022 should be excluded under the Speedy Trial Act because failure to grant the requested continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See 18 U.S.C. § 3161(h)(7)(B)(iv).* The ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial and in the prompt disposition of criminal cases. *See id. § 3161(h)(7)(A).*

3. Taking into account the public interest in the prompt disposition of criminal cases, there is good cause to extend the time limits under Federal Rule of Criminal Procedure 5.1. Accordingly, the time limits for conducting a preliminary hearing should be tolled from now through September 30, 2022.

IT IS SO STIPULATED.

DATED: September 19, 2022

Respectfully submitted,

STEPHANIE M. HINDS
United States Attorney

/s/
DANIEL PASTOR
Assistant United States Attorney

DATED: September 19, 2022

/s/
RANDY LUSKEY
Counsel for Defendant Griselda Cancelada

DATED: September 19, 2022

/s/
WARRINGTON PARKER
Counsel for Defendant Veronica Mora

DATED: September 19, 2022

/s/
DENNISE HENDERSON
Counsel for Defendant Yoselin Perez Ramirez

ORDER (AS MODIFIED)

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the time limits for conducting a preliminary hearing pursuant to Federal Rule of Criminal Procedure 5.1(c) are tolled from today's date through September 30, 2022.

The Court further finds that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in the filing of an information or indictment within the time period set forth in 18 U.S.C. § 3161(b) (the Speedy Trial Act). 18 U.S.C. § 3161(h)(7)(A). A failure to grant the requested exclusion and continuance would unreasonably deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

§ 3161(h)(7)(B)(iv).

The status on preliminary hearing or arraignment and Bail Review or Bond Hearing previously scheduled for September 22, 2022, are continued to September 30, 2022 at 10:30 a.m. before Magistrate Judge Donna M. Ryu in Oakland, Courtroom 4, 3rd Floor.

IT IS SO ORDERED.

DATED: September 19, 2022

